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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
Plaintiff,  
vs.  
SONOS, INC.,  
Defendant.

CASE NO. 3:20-cv-06754-WHA  
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN SUPPORT OF SONOS, INC.'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED (DKT. NO. 273)**

1 I, Jocelyn Ma, declare and state as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing  
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
 5 Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to  
 7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.  
 8 273) filed in connection with Sonos’s Reply In Support of Its Motion for Summary Judgment of  
 9 Infringement of ’885 Patent Claim 1 (“Reply”) (Dkt. No. 274). If called as a witness, I could and  
 10 would testify competently to the information contained herein.

11      3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Sonos’s Reply	Portions Highlighted in Green	Portions Highlighted in Green	Google
Exhibit R to Sonos’s Reply (“Exhibit R”)	Entire Document	Portions Outlined in Red Boxes	Google
Exhibit S to Sonos’s Reply (“Exhibit S”)	Entire Document	Entire Document	Google

19       4. I understand that the Court analyzes sealing requests in connection with motions for  
 20 summary judgment pursuant to the “compelling reasons” standard. *See, e.g., Edwards Lifesciences*  
*Corp. v. Meril Life Scis. Pvt. Ltd.*, No. 19-CV-06593-HSG, 2021 WL 5233129, at \*4 (N.D. Cal. Nov.  
 21 10, 2021); *Baird v. BlackRock Institutional Tr. Co., N.A.*, No. 17-CV-01892-HSG, 2021 WL 105619,  
 22 at \*5 (N.D. Cal. Jan. 12, 2021). I also understand that courts have found materials which detail  
 23 product architecture and could harm a litigant’s competitive standing are appropriately sealed under  
 24 this standard. *See, e.g., Icon-IP Pty Ltd. v. Specialized Bicycle Components, Inc.*, No. 12-cv-03844-  
 25 JST, 2015 WL 984121, at \*2 (N.D. Cal. Mar. 4, 2015); *Delphix Corp. v. Actifio, Inc.*, No. 13-cv-  
 26 04613-BLF, 2014 WL 4145520, at \*2 (N.D. Cal. Aug. 20, 2014).

1       5.     The portions of Sonos's Reply highlighted in green and Exhibit S contain references to  
2 Google's confidential business information and trade secrets, including details regarding source code,  
3 architecture, and technical operation of Google's products. The specifics of how these functionalities  
4 operate is confidential information that Google does not share publicly. Thus, I understand that the  
5 public disclosure of such information could lead to competitive harm to Google, as competitors could  
6 use these details regarding the architecture and functionality of Google's products to gain a  
7 competitive advantage in the marketplace with respect to their competing products. Google has  
8 therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY  
9 and/or HIGHLY CONFIDENTIAL—SOURCE CODE under the protective order (Dkt. No. 92). A  
10 less restrictive alternative than sealing would not be sufficient because the information sought to be  
11 sealed is Google's confidential business information and trade secrets but has been utilized by Sonos  
12 in support of Sonos's Reply.

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1       6. The portions of Exhibit R outlined in red boxes contain references to Google's  
2 confidential business information and trade secrets, including details regarding source code,  
3 architecture, and technical operation of Google's products. The specifics of how these functionalities  
4 operate is confidential information that Google does not share publicly. Thus, I understand that the  
5 public disclosure of such information could lead to competitive harm to Google, as competitors could  
6 use these details regarding the architecture and functionality of Google's products to gain a  
7 competitive advantage in the marketplace with respect to their competing products. Google has  
8 therefore designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY  
9 and/or HIGHLY CONFIDENTIAL—SOURCE CODE under the protective order (Dkt. No. 92).  
10 Although Sonos's Administrative Motion sought to seal the entirety of Exhibit R, Google seeks to  
11 seal only the portions outlined in red boxes in the unredacted version filed in connection with this  
12 Declaration. A less restrictive alternative than sealing would not be sufficient because the information  
13 sought to be sealed is Google's confidential business and trade secrets but has been utilized by Sonos  
14 in support of Sonos's Reply.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on May 26, 2022, in San Francisco, California.

18 | DATED: May 26, 2022

By: /s/ Jocelyn Ma  
Jocelyn Ma